

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC. PELVIC REPAIR
SYSTEMS PRODUCTS LIABILITY
LITIGATION

Master File No. 2:12-MD-02327
MDL 2327

ETHICON WAVE 4 CASES LISTED IN
EXHIBIT A

JOSEPH R. GOODWIN U.S. DISTRICT
JUDGE

**DEFENDANTS' NOTICE OF ADOPTION OF PRIOR DAUBERT MOTIONS AND
REPLY BRIEFINGS OF MICHAEL THOMAS MARGOLIS, M.D. FOR WAVE 4**

Come now, Defendants Ethicon, Inc., Ethicon, LLC and Johnson & Johnson (collectively, "Ethicon"), and hereby move to exclude certain general opinions of one of Plaintiffs' experts, Dr. Michael Thomas Margolis. Defendants adopt and incorporate by reference the *Daubert* motion filed against Dr. Michael Thomas Margolis for Ethicon Wave 1 cases, Dkt. Nos. 2029 (motion), 2031 (memorandum in support) and supporting Reply brief, Dkt. 2212, as well as their supplemental briefing filed in Ethicon Wave 3 cases, Dkt. Nos. 2832 and 2833.

Ethicon respectfully requests that the Court exclude Dr. Michael Thomas Margolis's testimony, for the reasons expressed in the Wave 1 and 3 briefings. This notice applies to the Wave 4 cases identified in Exhibit A attached hereto.

Respectfully submitted,

/s/Christy D. Jones

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CERTIFICATE OF SERVICE

I hereby certify that on this day I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

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EXHIBIT A

EXHIBIT A

Case Name	Case Number	Product
Deborah Bowers v. Ethicon, Inc., et al.	2:12-cv-05477	Prolift, TVT
Rachel Bynum, et al. v. Ethicon, Inc., et al.	2:12-cv-03729	TVT, TVT-O
Addie Clark v. Ethicon, Inc., et al.	2:12-cv-03598	Prolift, TVT-O
Martha Cockman, et al. v. Ethicon, Inc., et al.	2:12-cv-05504	Prolift, TVT-O
Peggy Connolly, et al. v. Ethicon, Inc., et al.	2:12-cv-04026	TVT
Kathy Cross, et al., et al. v. Ethicon, Inc., et al.	2:12-cv-02281	TVT-O
Jackie L. Gaines v. Ethicon, Inc., et al.	2:12-cv-04844	TVT-O
Sondra Goins, et al. v. Ethicon, Inc., et al.	2:12-cv-03289	Prolift
Deborah M. Hartwig, et al. v. Ethicon, Inc., et al.	2:12-cv-05257	TVT-O, Gynemesh PS
Janice M. Holloway, et al. v. Ethicon, Inc., et al.	2:12-cv-03417	TVT, Gynemesh PS
Brenda Justice v. Ethicon, Inc., et al.	2:12-cv-03285	Prolift+ M
Darlene Martin, et al. v. Ethicon, Inc., et al.	2:12-cv-05394	TVT
Roxanna D. Miller, et al. v. Ethicon, Inc., et al.	2:12-cv-05185	TVT, Gynemesh PS

Thelma Norris, et al. v. Ethicon, Inc., et al.	2:12-cv-03294	Prolift, TVT-O
Leigh Price, et al. v. Ethicon, Inc., et al.	2:12-cv-04476	TVT-O
Janet Stensgard v. Ethicon, Inc., et al.	2:12-cv-05389	TVT
Juanita Stewart, et al. v. Ethicon, Inc., et al.	2:12-cv-03958	TVT
Betty Thornton v. Ethicon, Inc., et al.	2:12-cv-05115	Prolift
Diana Tucker, et al. v. Ethicon, Inc., et al.	2:12-cv-04958	TVT, Gynemesh PS
Melanie Turner v. Ethicon, Inc., et al.	2:12-cv-03847	TVT, TVT-O
Jasmine Valencia v. Ethicon, Inc., et al.	2:12-cv-05475	TVT
Gloria Wang, et al. v. Ethicon, Inc., et al.	2:12-cv-04466	Prolene mesh